

In Re:

Joint Application of STi Prepaid, LLC
 And Sprint Communications Company L.P. for
 Approval to Transfer the Assets of Sprint
 Communications Company L.P. to STi Prepaid, LLC

BEFORE THE
 PUBLIC SERVICE COMMISSION
 OF SOUTH CAROLINA

COVER SHEET

DOCKET
 NUMBER: 2008-210-C

(Please type or print)

Submitted by: Bonnie D. ShealySC Bar Number: 11125

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigator
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	



ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA, SOUTH CAROLINA

July 10, 2008

VIA ELECTRONIC FILING

Mr. Charles Terreni
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Public Service Commission of South Carolina
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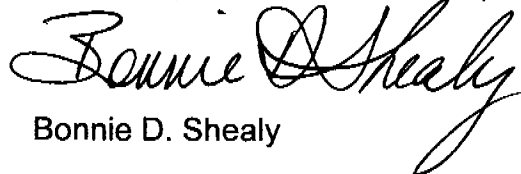
Re: STi Prepaid / Sprint Asset Transfer Application
Docket No. 2008-210-C
Our File No. 30323-0002

Dear Mr. Terreni:

Enclosed for filing please find STi Prepaid's motion for expedited review of its joint application with Sprint Communications Co. to transfer certain assets from Sprint to STi Prepaid with the attached verified testimony of Mr. Richard Rebetti, STi Prepaid's Chief Operating Officers. The Office of Regulatory Staff does not object to the motion. By copy of this letter we are serving the same on the other interested parties. Please let us know if you have any questions.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.



Bonnie D. Shealy

/bds

Enclosures

cc/enc: Angela F. Collins, Esquire (via email)
John J. Pringle, Jr., Esquire (via email & U.S. Mail)
Lessie Hammonds, ORS Staff Attorney (via email & U.S. Mail)

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2008-210-C

Joint Application of)	
)	
STi Prepaid, LLC and Sprint)	STi Prepaid's Motion for Expedited
Communications Company L.P.)	Review of Application
For Approval to Transfer the Assets)	
Of Sprint Communications Company)	
L.P. to STi Prepaid, LLC)	
<hr/>)	

The Applicant STi Prepaid, LLC ("STi Prepaid") hereby moves pursuant to 26 S.C. Regs. § 103-829 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission") that the Commission waive the requirement to hold a hearing to approve the transfer of certain assets from Sprint Communications Company, L.P. ("Sprint") to STi Prepaid. In support of this motion, STi Prepaid would show the following:

1. As described in detail in the Application, the Applicants seek the Commission's approval to transfer certain assets of Sprint related to the provision of prepaid calling card services including tangible prepaid card inventory, customer agreements and contracts, vendor agreements and contracts, prepaid card point-of-sale and promotional materials, and personal identification numbers ("PINs") used to make prepaid calling card calls.. The Applicants also seek a waiver of the applicable anti-slamming regulations to the extent required. Any consumers holding Sprint prepaid calling cards previously issued will continue to receive the same high quality service, at the same rates, and under the same terms and conditions. Sprint will retain its authority to provide telecommunications services to continue to serve its other customers in South Carolina.

2. STi Prepaid published the notice of filing of the application as required by the Commission. The deadline for filing petitions to intervene in the proceeding was June 19, 2008, and no comments or petitions to intervene have been filed.

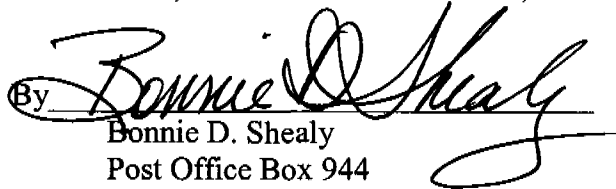
3. The Office of Regulatory Staff does not oppose the application or this motion for expedited review. Sprint also consents to the motion. Since no intervenors filed petitions in the proceeding, STi Prepaid respectfully requests that the Commission waive the hearing requirement and process this application without a formal hearing. The South Carolina Administrative Procedures Act provides the Commission with flexibility in regard to hearings for contested cases. "Unless precluded by law, informal disposition may be made of any contested case by stipulation, agreed settlement, consent order or default." S.C. Code § 1-23-320(f).

4. Attached to this motion as Exhibit 1 is the verified testimony of Richard Rebetti the Chief Operating Officer, of STi Prepaid. This testimony further describes the asset transfer, the public interest considerations involved with the transfer, and its transparency for South Carolina customers.

WHEREFORE, STi Prepaid respectfully requests that the Commission waive its hearing requirement and approve the transfer of assets.

Dated this 10th day of July, 2008.

ROBINSON, McFADDEN & MOORE, P.C.

By 
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Attorneys for STi Prepaid, LLC

We consent:

SPRINT COMMUNICATIONS COMPANY

By *Deputy John J. Pringle w/permission*
John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
1501 Main Street, 5th Floor
P.O. Box 2285
Columbia, SC 29202
Telephone (803) 343-1270

EXHIBIT 1

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2008-210-C

Joint Application of)
)
STi Prepaid, LLC and Sprint)
Communications Company L.P.)
For Approval to Transfer the Assets)
Of Sprint Communications Company)
L.P. to STi Prepaid, LLC)
_____)

**TESTIMONY OF RICHARD REBETTI
ON BEHALF OF STI PREPAID, LLC**

1 Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

2 A. My name is Richard Rebeti and I am Chief Operating Officer of STi Prepaid, LLC ("STi
3 Prepaid"). My business address is One Technology Center, Suite 300, Tulsa, Oklahoma,
4 74103. I am currently responsible for Information Systems, Customer Service, Quality
5 Assurance, Mobile Activation, Care and Support.

6 Q. WHO ARE THE APPLICANTS?

7 A. STi Prepaid and Sprint Communications Company, L.P. ("Sprint").

8 Q. PLEASE BRIEFLY DESCRIBE THE APPLICANTS.

9 A. STi Prepaid is a Delaware limited liability company that provides prepaid calling card
10 and dial-around services in South Carolina. The Commission authorized STi Prepaid to
11 offer intrastate interexchange telecommunications services to customers in Order No.
12 2007-498.

13 Sprint is a Delaware limited partnership certificated to provide intrastate interexchange
14 telecommunications services in South Carolina.

15 Q. WHOM DO YOU REPRESENT?

16 A. I represent STi Prepaid.

17 Q. ARE YOU FAMILIAR WITH THE APPLICATION SUBMITTED TO THIS
18 COMMISSION?

19 A. Yes, I am.

20 Q. WHAT IS THE AUTHORITY THAT THE APPLICANTS SEEK?

21 A. The applicants seek authority from the Commission to transfer certain assets from Sprint
22 to STi Prepaid and a waiver of applicable anti-slamming regulations to the extent
23 required.

1 Q. CAN YOU BRIEFLY OUTLINE THE TRANSACTION FOR WHICH THE
2 APPLICANTS SEEK THE COMMISSION'S APPROVAL.

3 A. On April 7, 2008, Sprint and certain of its affiliates (collectively, "Sellers") entered into
4 an Asset Purchase Agreement ("Agreement") with STi Prepaid pursuant to which Sellers
5 agreed to transfer certain assets to STi Prepaid. Specifically, Sellers agreed to transfer all
6 of their assets related to the provision of prepaid calling card services, including tangible
7 prepaid card inventory, customer agreements and contracts, vendor agreements and
8 contracts, prepaid card point-of-sale and promotional materials, and personal
9 identification numbers ("PINs") used to make prepaid calling card calls.

10 Q. WHAT IMPACT WILL THIS TRANSACTION HAVE ON SPRINT'S PREPAID
11 CALLING CARD CUSTOMERS IN SOUTH CAROLINA?

12 A. The proposed transfer of assets will not adversely affect the provision of
13 telecommunications services to Sprint's customers. Both carriers will continue to offer
14 intrastate telecommunications services in South Carolina pursuant to their Commission-
15 issued authorizations. Sprint would continue to serve its other South Carolina customers.
16 Once the transaction is complete, any prepaid calling cards that remain in the market that
17 list Sprint as the provider will continue to be available for use. STi Prepaid will continue
18 to provide the underlying telecommunications services associated with these Sprint
19 prepaid cards. Sprint will keep its prepaid service in its tariff until the later of (1) the
20 twelve month anniversary of the closing date of the transaction; or (2) the twelve month
21 anniversary of the date the retailer from which the prepaid card was sold is transitioned
22 from Sprint-marked cards to STi Prepaid marked cards. Usage allowances will not expire
23 after the twelve month period described above. Any consumers holding Sprint prepaid
24 cards previously issued will continue to receive service without interruption and without

1 an increase in rates, or changes in terms or conditions. STi Prepaid will not charge a
2 higher rate than what is displayed on the Sprint prepaid card, but reserves the right to
3 reduce the rate.

4 Q. WHY HAVE YOU REQUESTED A WAIVER OF ANTI-SLAMMING
5 REGULATIONS?

6 A. Customer notice is not required in this case because Sprint's prepaid calling cards do not
7 have a dedicated customer base. Sprint's prepaid cards can be used by any person at any
8 time by dialing a specified number and access code prior to making a telephone call.
9 Consumers will be informed that STi Prepaid and not Sprint is the service provider once
10 they dial the toll free access number and enter the PIN to make a prepaid call. As
11 indicated in our joint application, Sprint intends to post a notice on its website to inform
12 prepaid card consumers that STi Prepaid is now the provider of the service, and that
13 Sprint's domestic prepaid card rates will remain in effect for a period of at least twelve
14 months.

15 Sprint has no knowledge of the identity of the persons that are using its prepaid calling
16 card services, and has no relationship with the people utilizing the prepaid calling cards.
17 Out of an abundance of caution, the Applicants are requesting a wavier from any anti-
18 slamming regulations that may be violated by this transfer being made without the
19 specific authorization and verification of each affected customer.

20 Q. IS THE APPROVAL OF THIS TRANSACTION IN THE PUBLIC INTEREST?

21 A. Yes, it is. The proposed transaction will promote competition in the telecommunications
22 market by ensuring that consumers continue to have a wide range of telecommunications
23 choices in the prepaid calling card market. From the perspective of affected customers,
24 the transfer is transparent, leaving unaltered the quality of service they expect. South

1 Carolina consumers will benefit from improved services and competitive rates as a result
2 of the promotion of competition in the market.

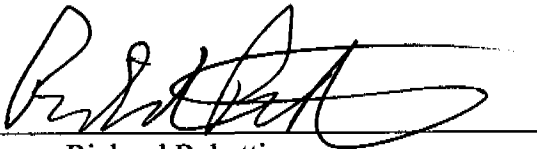
3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

4 A. Yes, it does.

VERIFICATION

I, Richard Rebetti, first being duly sworn upon oath, depose and say that I am authorized to represent STi Prepaid, LLC.; that I have read the above and foregoing-pre-filed testimony and know the contents; that the contents are true and correct to the best of my knowledge and belief.

STi Prepaid, LLC


Richard Rebetti

Subscribed and sworn to before me

this 8 day of July, 2008.



ETHAN MIDDLEBROOKS
Notary Public, State of New York
No. 01418170638
Qualified in New York County

Notary Public for ~~the State of New York~~ Expires December 24, 2011

My Commission Expires: 24 December, 2011

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-210-C**

In Re:

Joint Application of STi Prepaid,
LLC And Sprint Communications
Company L.P. for Approval to
Transfer the Assets of Sprint
Communications Company L.P. to
STi Prepaid, LLC

CERTIFICATE OF SERVICE

This is to certify that I, Leslie L. Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Motion for Expedited Review of its Joint Application with Sprint Communications Co.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
P.O. Box 2285
Columbia, SC 29202

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201

Dated at Columbia, South Carolina this 10th day of July, 2008.



Leslie L. Allen